

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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JOHN J. VAUGHN, GERALD A.  
KALBFLEISCH, MICHAEL HATHAWAY :  
and MYRTLE HATHAWAY :  
:  
Plaintiffs, :  
:  
v. : Civil Action  
: No. 04-10988-GAO  
:  
PUTNAM INVESTMENT MANAGEMENT, : **ORAL ARGUMENT**  
LLC and PUTNAM RETAIL : **REQUESTED**  
MANAGEMENT LIMITED PARTNERSHIP :  
:  
Defendants.  
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**MOTION FOR A PROTECTIVE ORDER AS TO  
THE DEPOSITION OF PUTNAM PRESIDENT AND CEO CHARLES HALDEMAN**

Pursuant to Fed. R. Civ. P. 26(c), defendants Putnam Investment Management, LLC and Putnam Retail Management Limited Partnership (collectively "Defendants") and Putnam President and CEO Charles Haldeman hereby move for a protective order as to the deposition of Mr. Haldeman, providing the following relief:

(1) That the Court require Plaintiffs' counsel to identify the information they seek through deposition of Mr. Haldeman, and explain why they cannot obtain that information by some other means; and

(2) If the Court is satisfied with this showing, that it limit the deposition to subject areas that Plaintiffs' counsel has demonstrated to be warranted, and to a time period that is appropriate in light of that showing, e.g., three hours.

The grounds for this motion are set forth in the accompanying memorandum of law, and a proposed Order is attached hereto as Exhibit 1.

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(D), movants respectfully request a hearing on this motion.

**CERTIFICATION PURSUANT TO LOCAL RULES 7.1(A)(2) AND 37.1**

The undersigned counsel hereby certify that they have conferred with counsel for Plaintiffs, and that the parties were not able to reach agreement on the issue presented in this motion.

Dated: March 27, 2007  
Boston, Massachusetts

Respectfully submitted,

/s/ James R. Carroll  
James R. Carroll (BBO #554426)  
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Counsel for Defendants  
Putnam Investment Management,  
LLC and Putnam Retail Management  
Limited Partnership, and Charles Haldeman

**Certificate Of Service**

I, Scott T. Lashway, hereby certify that on March 27, 2007, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 27, 2007.

Dated: March 27, 2007

/s/ Scott T. Lashway  
Scott T. Lashway